

EXHIBIT I

[Excerpts of a September 27, 2018 letter from Beko Reblitz-Richardson to Eric Vandavelde – REDACTED]



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4. Rimini Gateway Virtual Machines

In his May 17, 2016 Rule 30(b)(6) deposition, Steven Salaets testified that Rimini uses [REDACTED] for all of the [REDACTED]. May 17, 2016 30(b)(6) Deposition of S. Salaets at 49:14-50:14, 84:24-25. He further testified that in [REDACTED] Rimini [REDACTED] and then [REDACTED].” *Id.* at 41:1-20, 264:10-17. Mr. Salaets admitted that at the time it [REDACTED], Rimini [REDACTED] whether the [REDACTED]. *Id.* at 263:23-264:3. He also admitted that “[REDACTED],” Rimini did not [REDACTED]; instead, it [REDACTED] them. *Id.* at 42:11-22. In other words, Rimini [REDACTED] [REDACTED] [REDACTED]” *Id.*

In Professor Astrachan’s rebuttal report, he relies on Mr. Salaets’ testimony to argue that [REDACTED] Astrachan Rebuttal ¶ 601. He further contends that [REDACTED] *Id.* He criticizes Ms. Frederiksen-Cross for failing to state in her supplemental report that any of the [REDACTED] *Id.*

To date, Rimini has failed to produce, or provide any explanation for failing to produce, any of Rimini’s gateway machines. Following Oracle’s request, in July 2016, Rimini produced a “Gateway List” (RSI2_012730138), but never provided any information about the contents of those machines, or the metadata associated with the files on those machines. Such evidence is necessary in order to evaluate the accuracy of Professor Astrachan’s assertion that the [REDACTED] Please state whether Rimini does not now have or, alternatively, refuses to produce any of Rimini’s gateway machines.

5. Rimini Materials Deleted From AFW FTP Folders

Professor Astrachan states that [REDACTED] Astrachan Rebuttal ¶ 177. He further admits that [REDACTED] *Id.* By Professor Astrachan’s own admission, the only place to [REDACTED]

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[REDACTED] is on Rimini's [REDACTED], because the [REDACTED] on [REDACTED] are [REDACTED].

However, Rimini has not produced files from its internal shared drives corresponding to all of the files Rimini transferred via its AFW FTP process. Rimini admitted that [REDACTED] and [REDACTED] July 20, 2016 Email from J. Metallo to M. Lin, et al. Comparing the record Rimini produced of all of its AFW FTP transfers to Rimini's productions of FTP folders from its internal shared drive, [REDACTED] for which there is no corresponding [REDACTED] See Attachment A. Please confirm that these files are no longer in Rimini's possession and therefore will not be produced.

6. Rimini Environments 2.0 Migration Smartsheet Data

According to Steven Salaets, the [REDACTED] for [REDACTED] [REDACTED] are the [REDACTED], which purport to include the [REDACTED] of the [REDACTED]. See May 17, 2016 30(b)(6) Deposition of S. Salaets at 206:21-208:1, 223:21-224:14, Ex. 216. However, Rimini's production of the Smartsheets does not contain the [REDACTED] during the [REDACTED]; instead, the [REDACTED]: [REDACTED] See Salaets Ex. 216. According to Manjula Hosalli, [REDACTED] Dec. 15, 2016 Deposition of M. Hosalli at 232:4-9.

Please confirm that Rimini no longer is in possession of the data representing the actual start or end dates purportedly entered on the Smartsheets, and is therefore unable to produce this information.

Very truly yours,

/s/ *Beko Reblitz-Richardson*

Beko Reblitz-Richardson

cc via email:

Jeffrey T. Thomas
